

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

United States District Court
Southern District of Texas
FILED

JUL 29 1998

AMERICAN DENTAL TECHNOLOGIES, INC. :

Plaintiff, :

v. :

KREATIV, INC. :

Defendant. :

Michael N. Milby, Clerk

Civil Action No.
C-98-181

**PLAINTIFF AMERICAN DENTAL TECHNOLOGIES, INC.'S
ANSWER TO DEFENDANT'S COUNTERCLAIMS**

Plaintiff, American Dental Technologies, Inc. ("ADT")
answers the counterclaims of defendant, Kreativ, Inc. ("Kreativ")
as follows:

1. ADT lacks knowledge or information sufficient to
form a belief as to the allegation in Paragraph 1 and therefore
denies same.

2. ADT admits the allegations in Paragraph 2 of the
counterclaims.

3. ADT admits the allegations in Paragraph 3 of the
counterclaims.

4. ADT admits the allegations in Paragraph 4 of the
counterclaims respecting ADT's filing of this suit alleging that
Kreativ infringes the '596 patent; ADT denies that there is a
substantial and continuing justiciable controversy as to ADT's
right to maintain its suit against Kreativ for infringement of
the '596 patent and denies that there is a substantial and
continuing justiciable controversy as to the invalidity and

unenforceability of that patent.

5. ADT admits the allegations in Paragraph 5 of the counterclaims.

6. ADT admits the allegations in Paragraph 6 of the counterclaims.

7. ADT repeats and incorporates by reference its replies to Paragraph 1-6 of the counterclaims.

8. ADT admits that the `596 patent relates to a method for treating teeth, that a dentist's office is one example of a place where the method would be carried out, and that Kreativ is in the business of selling products which can be used by dentists. ADT denies that Kreativ does not perform any of the methods claimed in the `596 patent.

9. ADT denies the allegations in Paragraph 9 of the counterclaims.

10. ADT denies the allegations in Paragraph 10 of the counterclaims.

11. ADT denies the allegations in Paragraph 11 of the counterclaims.


12. Subject to and without waiving the objections set forth in Plaintiff's Motion to Strike filed concurrently herewith, ADT denies the allegations of Paragraph 12 of Defendant's counterclaims.

7/25/98
Date

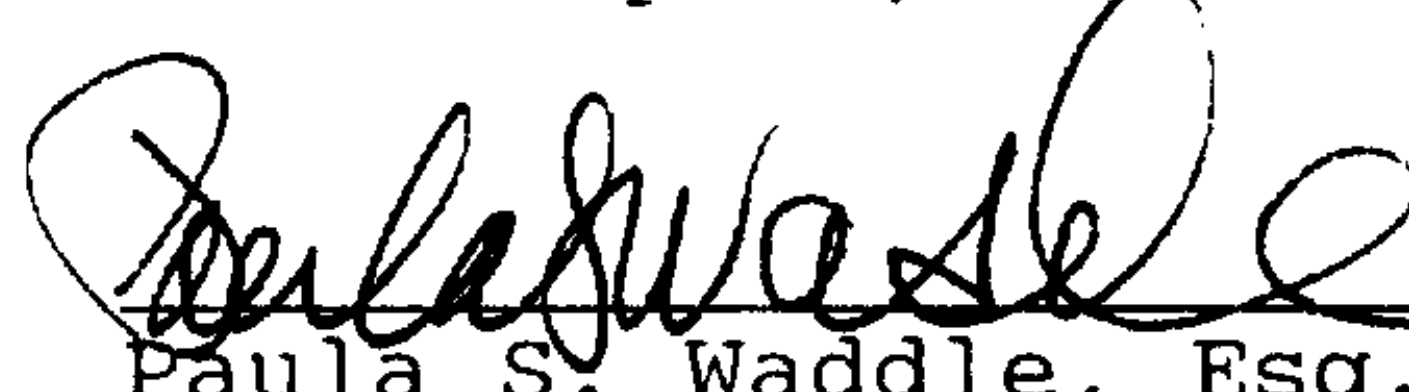
Tele: (215) 923-4466
Fax: (215) 923-2189

Tele: (512) 882-3995

Respectfully submitted,



Joseph F. Posillico
PA Attorney ID No. 45,189
Stephen J. Driscoll
PA Attorney ID No. 71,086
Theodore Naccarella
PA Attorney ID No. 81,713
SYNNESTVEDT & LECHNER LLP
2600 Aramark Tower
1101 Market Street
Philadelphia, PA 19107-2950



Paula S. Waddle, Esq.
531 South Shoreline
Corpus Christi, TX 78463

Attorneys for Plaintiff

m:\mds\ADT\22479\answer.clm